

REMARKS**I. Status of the Claims**

Claims 1-27 are currently pending.

By this Amendment, claims 1-5, 7-11, 13-18, 20-25 and 27 have been amended.

No new matter has been introduced by this Amendment. Entry and consideration of this Amendment are respectfully requested. Upon entry of this Amendment, claims 1-27 would be pending.

II. Rejections under 35 U.S.C. §102

Claims 1-27 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,067,624 to Kuno. Applicants respectfully traverse the rejection of these claims, for the reasons set forth below.

CLAIMS 1, 7, 14 AND 21:

Independent claims 1, 7, 14 and 21, as amended, are directed to an arrangement involving inputting a video camera control command to place a video camera control request for controlling the camera to the camera server and transmitting a video camera control right acquisition request for a video camera to the camera server in response to input of the video camera control command.

That is, a video camera control right acquisition request is transmitted to the camera server in response to input of a video camera control command for placing a video camera control request to the camera server.

In contrast, in Kuno, a video control input causes the client to send a control request (or command) and a privilege obtain input causes the client to send a privilege obtain request (or command). See Kuno, col. 4, lines 58-65. Kuno is silent as to a video control input causing sending of a privilege obtain request. As such, Kuno does not disclose or suggest the claimed relationship between transmission of a video camera control right acquisition request and input of a video camera control command as recited claims 1, 7, 14 and 21.

Accordingly, claims 1, 7, 14 and 21 and their dependent claims are patentably distinguishable over the cited reference.

Furthermore, the dependent claims recite additional features which further distinguish over the cited reference. For example, as to dependent claims 2, 3, 5, 8, 9, 11, 15, 16, 18, 22, 23 and 25, the Examiner has taken inconsistent positions in applying Kuno to the base independent claim and these dependent claims. Particularly, the Examiner alleges that the control command (e.g., Fig. 4B) of Kuno reads on the claimed acquisition request in rejecting the base independent claims, but then asserts that the privilege obtain command (e.g., Fig. 4A) of Kuno reads on the claimed acquisition request in rejecting these dependent claims. As such, these dependent claims further distinguish over the cited reference.

CLAIMS 13, 20 AND 27:

Independent claims 13, 20 and 27, as amended, are directed to an arrangement involving the registering of at least a client requesting acquisition of a video camera control right. If the video camera control command from a client not registered is received, the client is registered if there is no other client registered.

That is, in the claimed arrangement, a non-registered client submitting a video camera control command is granted control of the video camera and registered if there is no other client registered.

The Examiner maintains his rejection based on Kuno. The Examiner asserts that “Claim 13 is written broadly enough to read on Kuno’s granting control to a given user if no other user currently has control, with registration meaning the client currently granted control.” (Office Action, page 2). The same rationale is applied to the other independent claims. Applicants respectfully disagree with the Examiner’s assertions for the following reasons.

First, Kuno provides an arrangement in which a client registers with the camera control system by sending a camera-control privilege obtain command (e.g., $n=1$), and subsequently is granted control if the client is at the top of the registration queue. When the client is at the top of the registration queue, the client is “granted” control. However, the client must first register with the camera control server to obtain control of the camera. Kuno does not contemplate the situation when a video command control is sent to the client, without previously registering with the server (e.g., via the privilege obtain command). Thus, Kuno does not disclose or suggest that a non-registered client submitting a video camera control command is granted control of the video camera and registered if there is no other client registered.

Second, the Examiner’s assertions on page 2 of the Office Action is overly broad and is inconsistent with the rationale provided on Page 4 of the Office Action as it relates to claim 13. The Examiner asserts that “Claim 13 is written broadly enough to read on Kuno’s granting control to a given user if no other user currently has control, with registration meaning the client currently granted control.” (Office Action, page 2).

However, in the Kuno system, a client is granted control if it is at the top of a queue which requires pre-registration via privilege obtain command. That is, a client at the top of the queue already has the control rights. If the client is at the top of the queue, the client's commands are simply forwarded to the camera for implementation. Kuno appears to be silent as to any additional registration being performed by the Kuno system associated with such granting of control when a client sends a control command. The simple fact that a client is granted control right does not render obvious registration of the client in the Kuno system. The Examiner has not provided with reasonable particularity where such registration is performed in Kuno.

Furthermore, in the Examiner's scenario, the client would still have to register with the server via a privilege obtain command prior to any sending of a control command. As discussed above, in Kuno, the client on the top of the queue is granted control. As such, with respect to the Examiner's scenario, the client would already be at the top of the queue which requires pre-registration and have the control right when the client sends a video control command "if no other user's have control".

As discussed above, Kuno is directed to a system and method involving registered clients in a queue, and is silent as to: if the video camera control command from a client not registered is received, the client is registered if there is no other client registered.

Thus, Kuno does not disclose or suggest that a non-registered client submitting a video camera control command is granted control of the video camera and registered if there is no other client registered.

In view of the foregoing, claims 13, 20 and 27 and the claims dependent therefrom are patentably distinguishable over the cited reference.

CONCLUSION

Based on the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

AUTHORIZATION

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4503, Order No. 1232-4459. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

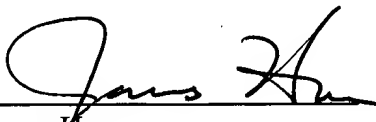
In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4503, Order No. 1232-4459. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

Respectfully submitted,
MORGAN & FINNEGAN

Dated: June 26, 2003

Mailing Address:
MORGAN & FINNEGAN
345 Park Avenue
New York, New York 10154
(212) 758-4800
(212) 751-6849 Facsimile

By:


James Hwa
Registration No. 42,680
(202) 857-7887 Telephone
(202) 857-7929 Facsimile